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U.S. DISTRICT COURT E.D.N.Y.

CCC/ALB:JLG  
F. #2019R01711

★ FEB 25 2020 ★

LONG ISLAND OFFICE

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
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UNITED STATES OF AMERICA

S U P E R S E D I N G  
I N D I C T M E N T

- against -

JONATHAN BERRETTA,  
TAYLOR PICK,  
MAUREEN SERRA and  
BENJAMIN DOWNS,

Cr. No. 20-029 (S-1) (JMA)  
(T. 18, U.S.C., §§ 2251(a), 2251(e),  
2253(a), 2253(b), 2 and 3551 et seq.;  
T. 21, U.S.C., § 853(p))

Defendants.

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THE GRAND JURY CHARGES:

COUNT ONE  
(Conspiracy to Sexually Exploit Children)

1. In or about and between January 2018 and February 2020, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants JONATHAN BERRETTA, TAYLOR PICK, MAUREEN SERRA and BENJAMIN DOWNS, together with others, did knowingly and intentionally conspire to employ, use, persuade, induce, entice and coerce one or more minors, to wit: Jane Doe #1, John Doe, Jane Doe #2 and Jane Doe #3, minor individuals whose identities are known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing one or more visual depictions of such conduct, knowing and having reason to know that such visual depictions would be transported and transmitted using one or more means and facilities of interstate and foreign commerce and in and affecting interstate and foreign commerce, which

visual depictions were produced and transmitted using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by one or more means, to wit: one or more mobile Internet devices, computers and smartphones, and such visual depictions were actually transported and transmitted using one or more means and facilities of interstate and foreign commerce, and in and affecting interstate and foreign commerce, contrary to Title 18, United States Code, Section 2251(a).

(Title 18, United States Code, Sections 2251(e) and 3551 et seq.)

COUNT TWO

(Sexual Exploitation of a Child: Jane Doe #1)

2. On or about July 22, 2019, within the Eastern District of New York, the defendant JONATHAN BERRETTA, together with others, did knowingly and intentionally employ, use, persuade, induce, entice and coerce a minor, to wit: Jane Doe #1, to engage in sexually explicit conduct for the purpose of producing one or more visual depictions of such conduct, to wit: the video depicted in the file "Video.mp4," knowing and having reason to know that such visual depictions would be transported and transmitted using one or more means and facilities of interstate and foreign commerce and in and affecting interstate and foreign commerce, which visual depictions were produced and transmitted using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by one or more means, to wit: one or more mobile Internet devices, computers and smartphones, and such visual depictions were actually transported and transmitted using one or more means and facilities of interstate and foreign commerce and in and affecting interstate and foreign commerce.

(Title 18, United States Code, Sections 2251(a), 2251(e), 2 and 3551 et seq.)

**COUNTS THREE THROUGH FIVE**  
 (Sexual Exploitation of a Child: John Doe)

3. On or about the dates and times set forth below, within the Eastern District of New York, the defendant TAYLOR PICK, together with others, did knowingly and intentionally employ, use, persuade, induce, entice and coerce a minor, to wit: John Doe, to engage in sexually explicit conduct for the purpose of producing one or more visual depictions of such conduct, to wit: the images depicted in the following files:

| <b>Count</b> | <b>Approximate Date and Time</b> | <b>File Name</b>            |
|--------------|----------------------------------|-----------------------------|
| THREE        | December 13, 2019, 08:33 ET      | 2019-12-13-08-33-38-182.jpg |
| FOUR         | January 15, 2020, 20:29 ET       | IMG_9044.HEIC               |
| FIVE         | January 15, 2020, 20:29 ET       | IMG_9045.HEIC               |

knowing and having reason to know that such visual depictions would be transported and transmitted using one or more means and facilities of interstate and foreign commerce and in and affecting interstate and foreign commerce, which visual depictions were produced and transmitted using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by one or more means, to wit: one or more mobile Internet devices, computers and smartphones, and such visual depictions were actually transported and transmitted using one or more means and facilities of interstate and foreign commerce and in and affecting interstate and foreign commerce.

(Title 18, United States Code, Sections 2251(a), 2251(e), 2 and 3551 et seq.)

**COUNTS SIX THROUGH EIGHT**  
 (Sexual Exploitation of a Child: Jane Doe #2)

4. On or about the dates and times set forth below, within the Eastern District of New York, the defendant MAUREEN SERRA, together with others, did knowingly and intentionally employ, use, persuade, induce, entice and coerce a minor, to wit:

Jane Doe #2, to engage in sexually explicit conduct for the purpose of producing one or more visual depictions of such conduct, to wit: the videos depicted in the following files:

| <b>Count</b> | <b>Approximate Date and Time</b> | <b>File Name</b> |
|--------------|----------------------------------|------------------|
| SIX          | January 16, 2020, 23:40 ET       | IMG_0004.MOV     |
| SEVEN        | January 16, 2020, 23:41 ET       | IMG_0009.MOV     |
| EIGHT        | January 17, 2020, 07:23 ET       | IMG_0039.MOV     |

knowing and having reason to know that such visual depictions would be transported and transmitted using one or more means and facilities of interstate and foreign commerce and in and affecting interstate and foreign commerce, which visual depictions were produced and transmitted using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by one or more means, to wit: one or more mobile Internet devices, computers and smartphones, and such visual depictions were actually transported and transmitted using one or more means and facilities of interstate and foreign commerce and in and affecting interstate and foreign commerce.

(Title 18, United States Code, Sections 2251(a), 2251(e), 2 and 3551 et seq.)

**COUNTS NINE THROUGH ELEVEN**  
**(Sexual Exploitation of a Child: Jane Doe #3)**

5. On or about the dates and times set forth below, within the Eastern District of New York, the defendant MAUREEN SERRA, together with others, did knowingly and intentionally employ, use, persuade, induce, entice and coerce a minor, to wit: Jane Doe #3, to engage in sexually explicit conduct for the purpose of producing one or more visual depictions of such conduct, to wit: the images depicted in the following files:

| <b>Count</b> | <b>Approximate Date and Time</b> | <b>File Name</b>            |
|--------------|----------------------------------|-----------------------------|
| NINE         | November 16, 2019, 10:04 ET      | RESIZED_20191116_100346.JPG |
| TEN          | November 16, 2019, 10:04 ET      | RESIZED_20191116_100348.JPG |
| ELEVEN       | November 16, 2019, 10:15 ET      | RESIZED_20191116_101506.JPG |

knowing and having reason to know that such visual depictions would be transported and transmitted using one or more means and facilities of interstate and foreign commerce and in and affecting interstate and foreign commerce, which visual depictions were produced and transmitted using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by one or more means, to wit: one or more mobile Internet devices, computers and smartphones, and such visual depictions were actually transported and transmitted using one or more means and facilities of interstate and foreign commerce and in and affecting interstate and foreign commerce.

(Title 18, United States Code, Sections 2251(a), 2251(e), 2 and 3551 et seq.)

#### CRIMINAL FORFEITURE ALLEGATION

6. The United States hereby gives notice to the defendants that, upon their convictions of any of the offenses charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 2253(a), which requires the forfeiture of (a) any visual depiction described in Sections 2251, 2251A, 2252, 2252A, 2252B or 2260 of Title 18 of the United States Code, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of such sections; (b) any property, real or personal, constituting, or traceable to, gross profits or other proceeds obtained from such offenses; and (c) any property, real or personal, used or intended to be used to commit or to promote the

commission of such offenses or any property traceable to such property, including but not limited to any electronic devices seized at the time of arrest of each of the defendants.

7. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be

divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 2253(a) and 2253(b); Title 21, United States Code, Section 853(p))

A TRUE BILL

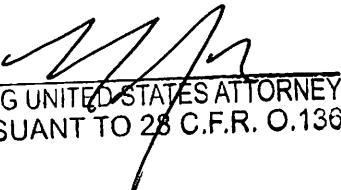


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FOREPERSON

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RICHARD P. DONOGHUE  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

BY:   
ACTING UNITED STATES ATTORNEY  
PURSUANT TO 28 C.F.R. O.136

No. CR 20-029 (S-1) (JMA)

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**UNITED STATES DISTRICT COURT**

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

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THE UNITED STATES OF AMERICA

vs.

*JONATHAN BERRETTA, TAYLOR PICK, MAUREEN SERRA and  
BENJAMIN DOWNS,*

Defendants.

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**INDICTMENT**

(T. 18, U.S.C., §§ 2251(a), 2251(e), 2253(a), 2253(b), 2 and  
3551 et seq.; T. 21, U.S.C., § 853(p))

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*A true bill.*

  
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*Clara* -----  
Foreperson

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*Filed in open court this \_\_\_\_\_ day,*

*of \_\_\_\_\_ A.D. 20 \_\_\_\_\_*

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Clerk

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*Bail, \$ \_\_\_\_\_*

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*Justina L. Geraci, Assistant U.S. Attorney (631) 715-7835*